

Counsel Appear on the Following Page

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

Mohan Gil, Rodney Carr, Tony
Daniel, and Jermaine Wright,
individually, on behalf of others
similarly situated, and on behalf of
the general public,

Plaintiffs,

v.

Solelectron Corporation, Flextronics
International, USA, Inc., and DOES
1-10 inclusive,

Defendants.

Case No. C 07-06414 RMW (HRL)

**[PROPOSED] CASE
MANAGEMENT ORDER**

Honorable Ronald M. Whyte
Complaint Filed: December 19, 2007

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17 Attorneys for INDIVIDUAL AND REPRESENTATIVE PLAINTIFFS

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Attorneys for DEFENDANTS

1 On April 18, 2008, Jessica J. Clay, Counsel for Plaintiffs, and Robert J.
2 Wilger, Counsel for Defendants Solectron Corporation and Flextronics
3 International, USA, Inc., (hereinafter referred to collectively as "Defendants")
4 appeared for a case management conference. It is hereby ordered as follows:

- 5 1. Plaintiffs will file and serve their Motion for Conditional Certification on
6 or before July 1, 2008;
 - 7 2. Plaintiffs will file and serve their Motion for Rule 23 Class Certification
8 on or before May 1, 2009;
 - 9 3. The Parties will complete discovery on the merits on or before June 1,
10 2009;
 - 11 4. The Parties will complete all expert discovery on or before June 12, 2009;
 - 12 5. The Parties will designate any expert witnesses and disclose any expert
13 reports/opinions on or before April 1, 2009;
 - 14 6. The Parties will file and serve any non-dispositive motions on or before
15 July 1, 2009;
 - 16 7. Any Summary Judgment Motions will be heard on September 4, 2009;
 - 17 8. The Parties will be ready-for-trial on November 30, 2009;
 - 18 9. The Parties will participate in an ADR phone conference on August 7,
19 2008 at 9:30 a.m.;
 - 20 10. Discovery in this case shall be limited as follows:
 - 21 a. Each side is limited to 60 hours of depositions;
 - 22 b. Plaintiffs may ask Interrogatories of Defendants related to their
23 policies and practices; and
 - 24 c. Defendants may ask Interrogatories of Plaintiffs related to the
25 Plaintiffs' biographical and work-history.
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2 Dated: April 21, 2008

NICHOLS KASTER & ANDERSON, PLLP

3 By: s/Jessica J. Clay

4 Jessica J. Clay

5 ATTORNEYS FOR PLAINTIFFS AND THE
6 PUTATIVE CLASSES
7

8 Dated: April 21, 2008

LITTLER MENDELSON,
9 A Professional Corporation

10 By: Robert J. Wilger

11 Robert J. Wilger

12 ATTORNEYS FOR DEFENDANTS
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16 IT IS SO ORDERED:

17 _____
18 The Honorable Robert M. Whyte
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